

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
NEW BERN DIVISION**

**IN RE:  
HILDA SHACKLEFORD SAFFORD  
DEBTOR**

**CHAPTER 13  
CASE NO.: 24-04496-5-JNC**

**RESPONSE TO MOTION TO RECONSIDER ORDER  
CONFIRMING CHAPTER 13 PLAN**

NOW COMES the Debtor, by and through undersigned counsel, responding to the Motion to Reconsider Order Confirming Chapter 13 Plan and showing unto the Court as follows:

1. The Debtor filed a petition under Chapter 13 of the United States Bankruptcy Code on December 30, 2024.
2. The Debtor's Chapter 13 Plan was confirmed on March 13, 2025.
3. The Debtor proposed, in the Debtor's Chapter 13 Plan, to pay the full balance of the claim of United Bank related to the Debtor's real property located at 314 E. Washington Ave., Kinston, North Carolina, as mortgage arrears, with interest at the rate of 0%.
4. The Debtor does not object to paying interest on the outstanding principal balance of the claim of United Bank at the contractual rate of interest of 8.5% and paying the pre-petition balance of outstanding interest and fees at 0% interest.

WHEREFORE, the undersigned respectfully requests that the Motion to Reconsider Order Confirming Chapter 13 Plan be denied and set for hearing.

This the 11th day of April, 2025.

/s/Lindsay M. Parker  
LINDSAY M. PARKER  
GILLESPIE & MURPHY, P.A.  
NC State Bar No. 50894  
PO Drawer 888  
New Bern, NC 28563  
(252) 636-2225 phone  
(252) 636-0625 facsimile  
gmpa@lawyersforchrist.com

CERTIFICATE OF SERVICE

I, Lindsay M. Parker, Attorney at Law certify:

That I am, and at all time hereinafter mentioned was, more than 18 years of age.

That on the 11th day of April, 2025, copies of the foregoing were served upon the following by depositing the same in the United States mail, postage pre-paid, addressed as follows or by electronic notification:

S. Troy Staley  
Chapter 13 Trustee

Via: CM/ECF

Eudora F.S. Arthur  
Womble Bond Dickinson (US) LLP  
555 Fayetteville Street, Suite 1100  
Raleigh, NC 27601

Hilda Shackleford Safford  
314 E. Washington Avenue  
Kinston, NC 28501-4461

I certify under penalty of perjury that the foregoing is true and correct.

DATED: April 11, 2025

/s/Lindsay M. Parker  
Lindsay M. Parker

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